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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON ERIC JOHNSON, a/k/a
JAY JOHNSON, *et al.*

Defendant.

CASE NO. 14-CR-73-CVE

**DEFENDANT JASON ERIC JOHNSON'S UNOPPOSED MOTION FOR EARLY
TERMINATION OF SUPERVISED RELEASE**

COMES NOW, JASON ERIC JOHNSON, by and through his attorney, RICHARD A. SCHONFELD, ESQ., of the law firm of CHESNOFF & SCHONFELD, and hereby submits this Unopposed Motion for Early Termination of Supervised Release.

This Motion is premised on the attached Memorandum of Points and Authorities.

DATED this 23rd day of June, 2020.

Respectfully Submitted:

/s/ Richard A. Schonfeld
RICHARD A. SCHONFELD, ESQ.
Nevada Bar No. 6815
CHESNOFF & SCHONFELD
520 South Fourth Street
Las Vegas, Nevada 89101
(702) 384-5563
Attorney for Jason Johnson

MEMORANDUM OF POINTS AND AUTHORITIES

The instant Motion is unopposed by Assistant United States Attorney Joel-lyn A. McCormick and the United States Probation Office in the District of Nevada, where Mr. Johnson is supervised.

Mr. Johnson has two cases in the United States District Court for the Northern District of Oklahoma. One case originated in this district (14-CR-73-CVE) and the other was transferred from the United States District Court for the District of Nevada (15-CR-151-CVE). Both cases arose from the same underlying course of conduct. Prior to these cases, Mr. Johnson had never been in trouble. In fact, there is not a single entry in the criminal history section of the Presentence Report.

Mr. Johnson entered his guilty pleas on November 6, 2015, and was sentenced on July 20, 2017. The offense conduct in the cases concluded, at the latest, in 2014.

Mr. Johnson was sentenced to a term of imprisonment of 18 months concurrent on each case. The sentences included a term of supervised release for 3 years. Mr. Johnson began serving his sentence on September 27, 2017, and was released on October 16, 2018. Mr. Johnson conducted himself in an exemplary manner while in custody and since his release.

Mr. Johnson now seeks to terminate his Supervised Release early, in part, so he can travel out of the United States, including the ability to travel to visit his minor son in Germany.

Given Mr. Johnson's lack of criminal history prior to this case, his exemplary conduct while on pretrial supervision, his exemplary conduct while in custody, and his exemplary conduct while on Supervised Release, it is respectfully requested that his supervision be terminated early.

1 This Honorable Court has the authority to grant this request pursuant to 18 U.S.C.
2 3583(e).

3 Dated this 23rd day of June, 2020.

4 Respectfully Submitted:

5 /s/ Richard A. Schonfeld
6 RICHARD A. SCHONFELD, ESQ.
7 Nevada Bar No. 6815
8 CHESNOFF & SCHONFELD
9 520 South Fourth Street
10 Las Vegas, Nevada 89101
11 (702) 384-5563
12 Attorney for Jason Johnson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing was served on the 23rd day of June, 2020, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list and to:

Joel-lyn A. McCormick
Northern District of Oklahoma
Assistant United States Attorney
Lead OCDETF Attorney
110 West 7th Suite #300
Tulsa, Oklahoma 74119
Tel.: (918) 382-2700
jamccormick@usa.doj.gov

/s/ Rosemary Reyes

Rosemary Reyes
Employee of Chesnoff & Schonfeld

PROPOSED ORDER

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OKLAHOMA

3 UNITED STATES OF AMERICA,)

4 Plaintiff,)

5 v.)

CASE NO. 14-CR-73-CVE

6 JASON ERIC JOHNSON, a/k/a)

7 JAY JOHNSON, *et al.*)

8 Defendant.)
9 _____)

10 **ORDER**

11 This matter having come before the Court on the Unopposed Motion of Defendant
12 Jason Eric Johnson for Early Termination of Supervised Release, with the United States
13 Attorney's Office for the Northern District of Oklahoma and the United States Probation Office
14 for the District of Nevada having no objection, and good cause appearing, the Court hereby
15 **GRANTS** said Motion.

16 It is hereby Ordered that Defendant Jason Eric Johnson is discharged from Supervised
17 Release and said Supervised Release is terminated.

18 Dated this _____ day of June, 2020.

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20 _____
21 THE HONORABLE CLAIRE V. EAGAN
22 United States District Court Judge
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